

JUN 28 2011

MARY E. D'ANDREA, CLERK  
Per \_\_\_\_\_ Deputy Clerk

Norman H. Shelton

United States District Court  
For the  
Middle District of Pennsylvania

"VS"

Plaintiff

Case 4:11-cv-00368-WJN-DB

Warden Bledsoe et al defendantsAffidavit in support of the plaintiff's  
Motion for the Appointment of Counsel

St Norman H. Shelton, Being of sound mind and body do state that the following statements and facts are true and correct to the very best of my knowledge. I make this affidavit in support of my motion for the appointment of counsel.

1.) The complaint in this case alleges that the plaintiff was attacked and assaulted in force against his will and placed in a cell with a gang member who punched and kicked plaintiff to the face and body for a whole three ~~minut~~ minutes while his hands were cuffed behind his back. Plaintiff was subjected to the misuse of force by several correctional officer's some of whom actively harass, threatens, pushed, punched, attacked and assault plaintiff before and after being placed in restraint.

2.) And others of whom watched and failed to intervene. It alleges that supervisory officials were aware of the violent propensities of some of the officers and are liable for failing to take action to control them. The plaintiff was subsequently denied due process in a disciplinary hearing by hearing officer Chambers. And his appeal was denied by the warden Bledsoe. Plaintiff was denied ordered medical care by the prison medical administrator and the deputy warden for

"Administration. This is a complex case because it contains different legal claims with each claim involving each defendant a different set.

3.) The case involves medical issues that may require expert testimony. The plaintiff has demanded a jury trial. The case will require discovery of documents and depositions of a number of witnesses. The testimony will be in sharp conflict, since the plaintiff alleges that the defendants assaulted him, while the defendants in their disciplinary reports asserted that he assaulted them.

4.) The plaintiff has only a high school education and has no legal education. The plaintiff is serving a sentence in punitive segregation for this reason he has very limited access to legal material and has no ability to investigate the facts of the case. For example, by locating, interviewing the other inmates who were eye witnesses to his beating. As set forth in the memorandum of Law submitted with this motion, these facts, along with the legal merit of the plaintiff's claims, support the ~~ex parte~~ appointment of counsel to represent the plaintiff.

"Wherefore", the plaintiff's motion for the appointment of counsel should be granted.

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Dated 6/26/11